

**Hogan
Lovells**

Hogan Lovells US LLP
390 Madison Avenue
New York, NY 10017
T +1 212 918 3000
F +1 212 918 3100
www.hoganlovells.com

December 5, 2019

VIA ECF

Honorable Richard M. Berman
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Ramses Owens, et al., 18 CR. 693 (RMB)

Dear Judge Berman:

We represent Richard Gaffey in the above-referenced matter. On behalf of both Mr. Gaffey and his co-defendant, Johan von der Goltz, we are writing to respectfully request a one-week adjournment of the date on which the joint jury charge and voir dire must be filed. The jury charge is currently scheduled to be filed on Monday, December 9, 2019. We are therefore respectfully requesting an adjournment until Monday, December 16, 2019. This is the defendants' first request for such an adjournment. We have conferred with the government, which has consented to this request.

The charges in this case are complex, including allegations of a long-term tax evasion conspiracy involving a number of complicated legal issues. The jury charge that the defense recently received from the government was 80 pages long, with nearly 50 separate jury instructions. With in limine motions also due to be filed on December 9, the defense will need additional time to review the charge provided by the government and to then confer with the government concerning the position of the defendants. This adjournment will not impact the schedule for trial, which is scheduled to begin on January 13, 2020.

Accordingly, the defendants respectfully request that the date on which the jury charge and voir dire must be submitted is adjourned to December 16, 2019.

Respectfully submitted,



Robert B. Buehler
Tel.: 212 918 3261
robert.buehler@hoganlovells.com

cc: Counsel of Record